

REMARKS

Claims 1-6, 8, 15, 19, 20 and 22-26 are pending in this application. By this Amendment, claims 1, 6, 8, 15, 19, 20 and 22-26 are amended. The amendments introduce no new matter because they are made to simply clarify features recited in the pending claims. Claims 7, 9-14, 16-18, 21, 27 and 28 are canceled without prejudice to, or disclaimer of, the subject matter recited in those claims. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The Office Action, in paragraph 2, rejects claims 1-14, 16 and 18-28 under 35 U.S.C. §102(b) as being anticipated by Micrografx Picture Publisher Limited Edition Reference Guide (hereinafter "Micrografx"). The Office Action, in paragraph 4, rejects claims 15 and 17 under U.S.C. §103(a) as being unpatentable over Micrografx in view of Applicants' Description of Related Art. These rejections are respectfully traversed.

The Office Action, with liberal reference to Micrografx, asserts that because Micrografx teaches combining document and image data and a digital graphic element (an image from the Windows clipboard, pp. 7-40 of Micrografx) or another graphic file (pp. 7-43 of Micrografx) that the "Paste" or "Paste From" commands available in Micrografx can reasonably be considered to teach the combination of all of the features positively recited in pending independent claims 1 and 20.

Without conceding the propriety of the rejections of the Office Action based on Micrografx, the claims are amended to recite an image forming device, and a method for forming a composite image in an image forming device, with detailed features that are specifically clarified to recite that the enumerated features are resident in the image forming device. There is nothing in Micrografx to suggest that the described capability can, or reasonably would, be made resident in an image forming device that includes all of the other features positively recited in, for example, independent claims 1 and 20.

In other words, there is nothing in Micrografx that can reasonably be considered to teach, or to have suggested, an image forming device including an imaging source, a digital graphic element forming unit, a composite image forming device, and an output unit with all the features positively recited in independent claim 1. Further, there is nothing in Micrografx that can reasonably be considered to teach, or to have suggested, a method of forming a composite image in an image forming device comprising the steps of scanning, retrieving and forming with all the features positively recited in independent claim 20.

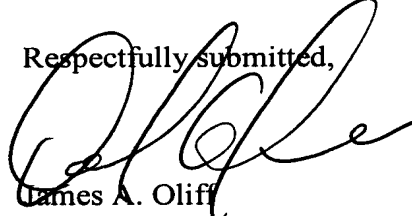
For at least the foregoing reasons, Micrografx, even in combination with Applicants' Description of Related Art, cannot reasonably be considered to teach, or to have suggested, the combinations of all of the features positively recited in independent claims 1 and 20. Further, claims 2-6, 8, 15, 19 and 22-26 also are neither taught, nor would they have been suggested, by Micrografx, even in combination with Applicants' Description of Related Art, for at least the respective dependence of these claims directly or indirectly on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejections of claims 1-6, 8, 15, 19, 20 and 22-26 under 35 U.S.C. §§102(b) and 103(a) as being anticipated by, or unpatentable over, the asserted references are respectfully requested.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-6, 8, 15, 19, 20 and 22-26 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the telephone number set forth below.

Respectfully submitted,



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JAO:DAT

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